

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

JOSEPH R. ERNST,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:11-cv-625
)	
EXPERIAN INFORMATION SOLUTIONS,)	
INC., <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANT WELLS FARGO'S NOTICE OF MOTION TO SEAL EXHIBIT A,
DECLARATION OF C. VANCE BECK, ESQ., TO DEFENDANT'S MEMORANDUM IN
OPPOSITON TO PLAINTIFF'S MOTION TO COMPEL**

PLEASE TAKE NOTICE THAT Defendant, Wells Fargo Bank N.A. as successor to Wachovia Mortgage, FSB, ("Defendant" or "Wells Fargo") by counsel, pursuant to Rule 5 of the Local Rules of Practice for the United States District Court for the Eastern District of Virginia, has moved this Court to seal ("Motion") Exhibit A, Declaration of C. Vance Beck, Esq. ("Beck Declaration") to Wells Fargo's Memorandum in Opposition to Plaintiff's Motion to Compel filed by Plaintiff, Joseph Ernst ("Plaintiff" or "Ernst").

1. The Beck Declaration discusses detailed information regarding two of Wells Fargo and Company's legal matter management databases, and the described information contains privileged, confidential, and contains proprietary, trade secret information, and therefore it is necessary to seal the Beck Declaration to protect disclosure of this information.

2. Before this Court may seal court documents, it must: "(1) provide public notice of the request to seal and allow interested parties a reasonable opportunity to object, (2) consider

less drastic alternatives to sealing the documents, and (3) provide specific reasons and factual findings supporting its decision to seal the documents and for rejecting the alternatives.”

Ashcraft v. Conoco, Inc., 218 F.3d 288, 302 (4th Cir. 2000).

3. In compliance with Local Rule 5 of the Rules of this Court and Ashcraft, the Court posts the following notice to the public: “This serves as public notice that Defendant, Wells Fargo Bank N.A. as sucesor to Wachovia Mortgage, FSB, has moved the Court to file under Exhibit A, Declaration of C. Vance Beck, Esq., to its Memorandum in Opposition to Plaintiff’s Motion to Compel. Objections to this Motion should be filed in the Civil Section of the Clerk’s Office.” The Notice will be posted for a minimum of forty-eight (48) hours.

WELLS FARGO BANK, N.A.,

/s/ Terry C. Frank

By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on this 27 day of February 2012, a true copy of the foregoing has filed with the Court's CM/ECF system, which will provide electronic notice to:

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